

NAILAH K. BYRD CUYAHOGA COUNTY CLERK OF COURTS 1200 Ontario Street

1200 Ontario Street Cleveland, Ohio 44113

Court of Common Pleas

New Case Electronically Filed: COMPLAINT August 26, 2020 15:39

By: EDWARD F. HERMAN 0086598

Confirmation Nbr. 2059230

MICHELLE L. SNYDER

CV 20 936470

VS.

FINLEY & CO., L.P.A.

Judge: J. PHILIP CALABRESE

Pages Filed: 38

COURT OF COMMON PLEAS CUYAHOGA COUNTY, OHIO

) Case Number:
Michelle L. Snyder)
25 Astor Place	
Rocky River, Ohio 44116,) Judge:
Plaintiff,)
,) COMPLAINT UNDER THE
vs.) FAIR DEBT COLLECTION
) PRACTICES ACT
Finley & Co., L.P.A.)
c/o David G. Finley, Registered Agent)
1701 East 12 th Street, Ste. 108	
Cleveland, Ohio 44114,)
)
Defendant.)

- 1. The Plaintiff, Michelle L. Snyder aka Michelle Snyder, is a natural person residing at 25 Astor Place, Rocky River, in Cuyahoga County, Ohio.
- 2. The Defendant, Finley & Co., L.P.A. ("Finley"), is a law firm in the business of collecting debts owed to others. Finley does business at 1701 East 12th Street, Ste. 108, Cleveland, in Cuyahoga County, Ohio.
- 3. Finley is a "debt collector" as defined by the Fair Debt Collection Practices Act ("FDCPA"), codified at 15 U.S.C., § 1692 *et seq*.
- 4. On behalf of its client, Zuckerman Lear & Murray Co. LPA ("Zuckerman"), Finley filed a debt collection complaint ("Complaint") against Michelle Snyder, and sought judgment against her, on August 30, 2019, in <u>Zuckerman Lear & Murray Co. LPA v. Charles D. Snyder, et al.</u>,
 Cuyahoga County Court of Common Pleas case number CV-19-920725. See Exhibit 'A'.
- In Complaint Finley alleged Michelle Snyder owes money to Zuckerman under the Ohio Necessaries Statute, codified at O.R.C. 3103.03, for criminal-defense legal services provided to Michelle Snyder's husband, C. David Snyder. Id.
- 6. The assertion that Michelle Snyder must pay for her husband's criminal-defense legal services

is not supported by Ohio law. This court in CV-19-920725 therefore dismissed the Complaint against Michelle Snyder. See Exhibit 'B'.

- 7. Finley made additional filings supporting Zuckerman's claim against Michelle Snyder. See Exhibit. Id.
- 8. On information and belief, Finley sent Michelle Snyder dunning letters and other correspondence in an attempt to collect the Zuckerman debt from her.
- 9. These false, misleading, or deceptive statements regarding the nature of the Zuckerman debt are violations by Finley of the FDCPA.
- 10. Michelle Snyder has been harmed by Finley's violations of the FDCPA. Michelle Snyder's harm is continuing, as Finley even now advances Zuckerman's debt claim against her. Id. WHEREFORE, Snyder prays for the following relief:
 - a. Declaratory judgment that Finley's conduct violates the FDCPA;
 - b. Statutory damages;
 - c. Actual damages including, but not limited to; Michelle Snyder's continuing legal costs to defend herself in CV-19-920725 and any related appeal;
 - d. Costs and reasonable attorney's fees incurred in this matter, and;
 - e. For other relief considered just and proper by this Court.

Respectfully submitted,

/s/Edward F. Herman

Edward F. Herman #0086598 Herman Law, LLC Attorney for Michelle L. Snyder 30628 Detroit Road, #231 Westlake, Ohio 44145 Phone: (216) 410-6261

Phone: (216) 410-626 Fax: (866) 755-0562

ed.herman@hermanlawgroup.com

Case: 1:20-cv-02144-DCN Doc #: 1-1 Filed: 09/22/20 4 of 39. PageID #: 6

EXHIBIT 'A'



NAILAH K. BYRD CUYAHOGA COUNTY CLERK OF COURTS

1200 Ontario Street Cleveland, Ohio 44113

Court of Common Pleas

New Case Electronically Filed: August 30, 2019 14:28

By: DAVID G. FINLEY 0003489

Confirmation Nbr. 1803967

ZUKERMAN LEAR & MURRAY CO. LPA

CV 19 920725

vs.

Judge: BRIAN J. CORRIGAN

CHARLES D. SNYDER, ET AL.

Pages Filed: 27

4496

IN THE COURT OF COMMON PLEAS CUYAHOGA COUNTY, OHIO

Zukerman, Lear & Murray Co., LPA : CASE NO.

3912 Prospect Ave., East

Cleveland, OH 44115 : JUDGE:

Plaintiff

VS.

Charles D. Snyder : <u>COMPLAINT</u>

Register No. 65286-060

FCI Morgantown : (JURY DEMAND ENDORSED HEREON)

446 Greenbag Rd., Route 857 Morgantown, WV 26501

And

Michelle Snyder : 19400 Frazier Dr. :

Rocky River, OH 44116

Defendants :

Case: 1:20-cv-02144-DCN Doc #: 1-1 Filed: 09/22/20 6 of 39. PageID #: 8

NOTICE

The Summons attached to this Complaint advises you of certain of your rights under state law for responding to this Complaint. Among these rights is your right to serve your Answer upon Finley & Co., L.P.A. within twenty-eight (28) days. If your name appears in numbered paragraph 1 below, you have additional rights under federal law to request certain information from Finley & Co., L.P.A. within thirty (30) days. These time periods run at the same time and start on the day after you receive this Complaint.

The federal Fair Debt Collection Practices Act requires that Finley & Co., L.P.A. provide you with the following information. The amount of the debt, as of March 11, 2019 is \$73,051.85. This amount is made up of your principal balance, interest, late charges, and amounts expended by the creditor, such as for taxes and insurance. Because many of these items vary from day to day, the amount due on the day you pay will be greater. Hence, if you pay the amount shown above, an adjustment will be necessary after we receive your check.

The creditor to whom the debt is owed is the plaintiff listed above. Unless, within thirty (30) days of your receipt of this Notice, you notify Finley & Co., L.P.A. that you dispute the validity of this debt or any portion of it, Finley & Co., L.P.A. will assume the debt is valid. Finley & Co., L.P.A. is a debt collector. This is an attempt to collect a debt, and any information obtained will be used for that purpose.

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If you notify Finley & Co., L.P.A. in writing within thirty (30) days of the receipt of this Notice that the debt or any portion thereof is disputed, Finley & Co., L.P.A. will obtain a verification of the debt and will mail a copy of that verification to you. If the creditor named as plaintiff above is not the original creditor, and if you make written request to Finley & Co., L.P.A. within thirty (30) days from the receipt of this Notice, Finley & Co., L.P.A. will provide you with the name and address of the original creditor.

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Plaintiff, by and through its undersigned attorney, for cause of action against the Defendants alleges:

FIRST CAUSE - ON ACCOUNT

- 1. The cause of action arose within the territorial jurisdiction of this Court, as a result of defendant Charles D. Snyder transacting business within the State of Ohio.
- 2. Defendants owe Plaintiff \$71,703.50 for legal fees according to the account hereto annexed as Exhibit "A."
- 3. Defendants, in addition, owe Plaintiff \$763.76 for expenses according to the account hereto annexed as Exhibit "B".
- 4. Said Defendants have failed and refused to pay the \$72,467.26 balance due and owing although demand has been made.

SECOND CAUSE- UNJUST ENRICHMENT

- 5. Plaintiff incorporates by reference paragraphs 1 and 4 above as if fully rewritten herein.
- 6. Defendants had knowledge of and accepted the benefit of the services and/or goods provided by Plaintiff.
- 7. Defendants explicitly or implicitly promised to pay for the charges listed in the Complaint.
 - 8. Plaintiff reasonably relied to its detriment on the above promise to pay.
 - 9. Defendants have been unjustly enriched in the amount of \$72,467.26.

10. Defendants have failed and/or refused to pay the balance due and owing although demand has been made, thereby breaching its agreement with Plaintiff.

THIRD CAUSE - SPOUSE'S OBLIGATION TO SUPPORT

- 11. Plaintiff incorporates by reference paragraphs 1 through 10 above as if fully rewritten herein.
- 12. At all times pertinent, defendant Michelle Snyder was the spouse of defendant Charles D. Snyder.
- 13. Defendant Michelle Snyder failed or refused to make adequate provision for the support of her husband.
- 14. Plaintiff, in good faith, furnished legal services that were reasonable and necessary for the support of defendant Michelle Snyder's husband, i.e. defense against criminal charges carrying a potential sentence of incarceration.
- 15. Plaintiff relied upon the married status of Charles D. Snyder, including therefore, implicitly or explicitly, the credit of said defendant, Michelle Snyder, in furnishing said necessaries.
- 15. Defendant Michelle Snyder owes Plaintiff \$72,367.26 for the necessaries it furnished for the support of her spouse, Defendant Charles D. Snyder.

WHEREFORE, Plaintiff demands judgment against Defendants, Charles D. Snyder and Michelle Snyder, jointly and severally, for the sum of \$72,367.26 plus interest at the statutory rate per annum from May 17, 2018, plus court costs.

Respectfully submitted,

FINLEY & CO., L.P.A.

/s/ David G. Finley
David G. Finley, #0003489
Attorney for Plaintiff
1701 E. 12th St., #108
Cleveland, Ohio 44114
Tel. (216) 574-4814
Fax (216) 920-9560
e-mail: david@dfinleylaw.com

JURY TRIAL

Plaintiff demands a trial by jury.

/s/ David G. Finley
David G. Finley, #0003489
Attorney for Plaintiff

REQUEST FOR SERVICE

Please serve the Defendants by issuing a summons, together with a copy of this complaint by certified mail, return receipt requested, to the aforementioned Defendants at the address provided in the caption of this complaint. If certified mail is returned to the post office marked "unclaimed" or "refused," please reissue service of summons to the aforementioned Defendants by ordinary mail in accordance with Civil Rule 4.6(C) or 4.6(D).

/s/ David G. Finley
David G. Finley, #0003489
Attorney for Plaintiff

Zukerman, Lear & Murray Co., L.P.A.

3912 Prospect Avenue, East Cleveland, OH 44115 US (216)696-0900

INVOICE

BILL TO

Charles David Snyder

INVOICE # 14129

DATE 05/01/2018

DATE	DESCRIPTION	QTY	RATE	AMOUNT
03/19/2018	LWZ - Review contract.	0.50	450.00	225.00
03/19/2018	SML - Discuss with LWZ and revise fee agreement.	0.30	395.00	118.50
04/10/2018	LWZ - Pleadings; Meet with Fedor; Document review.	6.75	450.00	3,037.50
04/11/2018	LWZ - Review brief re: discovery compliance; Meet with BAM and SML; Email to client and Fedor; Review evidence.	3	450.00	1,350.00
04/12/2018	BAM - Meet with SML to discuss potential future motions on case.	0.30	300.00	90.00
04/12/2018	LWZ - Document review.	2	450.00	900.00
04/13/2018	LWZ - Review evidence; Prep.	2.50	450.00	1,125.00
04/15/2018	SML - Research - re: tax - 7202 prosecutions and defenses	0.60	395.00	237.00
04/15/2018	SML - Review discovery and Fedor documents and research re: 7202 defenses and willfully element (home)	5.20	395.00	2,054.00
04/16/2018	SML - Prep for meeting.	0.70	395.00	276.50
04/16/2018	SML - Meeting with Snyder, Gary Gruver, Bob Fedor (and LWZ by	2,30	395.00	908.50

2669260 / CLDSZ

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DATE (DESCRIPTION AND AND AND AND AND AND AND AND AND AN	QTY	RATE	AMOUNT
	phone) re: expert witness report, witnesses, general defense d iscussions.			
04/16/2018	LWZ - Conference call with expert and counsel.	1.25	450.00	5 62.50
04/18/2018	BAM - Review indictment, prior discovery pleadings and notices filed with court; Draft motion to compel discovery, prior court orders, research case law regarding discovery issues.	3.50	300.00	1,050.00
04/18/2018	LWZ - Meet with SML and BAM; Pleadings.	2.50	450.00	1,125.00
04/19/2018	BAM - Draft and file motion to compel discovery; Research case law regarding discovery issues; Meet with LWZ, SML and RJF.	11	300,00	3,300.00
04/19/2018	LWZ - Meet with expert and Fedor and SML; T/C with Collyer; Letter to Collyer; Expert Report.	4.25	450.00	1,912.50
04/19/2018	LWZ - Meet with Bob/Review pleadings and discovery.	5.25	450.00	2,362.50
04/19/2018	SML - Meeting with Bob Fedor, LWZ, BAM, Gary Gruver re: expert prep and expert report, discovery notices and motion to compel.	8.30	395.00	3,278,50
04/22/2018	BAM - Review discovery; Research and motion to dismiss indictment.	6	300.00	1,800.00
04/23/2018	BAM - Review discovery; Research and motion to dismiss indictment.	14	300.00	4,200.00
04/23/2018	LWZ - Trial prep.	5	450.00	2,250.00
04/24/2018	BAM - Research and motion to dismiss indictment.	13.80	300.00	4,140.00
04/25/2018	BAM - Research and draft motion to disclose jury transcript; Research and draft motion to dismiss indictment.	10.50	300.00	3,150.00
04/25/2018	LWZ - Meet with BAM and SML.	0.50	450.00	225.00
04/25/2018	SML - Discussions with	0.70	395.00	276.50

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DATE	DESCRIPTION	YTQ	RATE	AMOUNT
	BAM and LWZ; Review motion to dismiss drafts.			
04/26/201	8 BAM - Meet with RJF, LWZ, SML, research, draft, and file motion to disclose grand jury transcript, research, draft and file motion to dismiss indictment.	12.30	300.00	3,690.00
04/26/201	8 LWZ - Review MTD; Meet with SML and Fedor.	6.75	450.00	3,037.50
04/26/201	8 SML - Meeting with Bob Fedor, BAM, LWZ; Reviewing drafts of Motion to Dismiss; Revisions, etc Review draft motion grand jury; Discussions with LWZ and BAM.	4.70	395.00	1,856.50
04/27/201	8 LWZ - Trial prep.	3.7 5	450.00	1,687.50
05/04/201		3.80	300.00	1,140.00
05/04/201	8 SML - Print and review government briefs in opposition.	0.80	395.00	316.00
05/04/2016	SML - Meeting re: trial prep and pretrial motion - Reply brief, etc.	3	395.00	1,185.00
05/04/2018	• •	6.50	450.00	2,925.00
05/07/2018	-	6	300.00	1,800.00
05/07/2018	•	6	395.00	2,370.00
05/07/2018	B LWZ - Prep and review.	3.25	450.00	1,462.50
05/08/2018	BAM - Review discovery; Research case law; Draft	3.20	300.00	960.00

DATE	DESCRIPTION	QTY	RATÉ	AMOUNT
	Reply in Support of Motion for Grand Jury testimony.			
05/09/2018	BAM - Review discovery; Research case law; Draft, review, edit and file motion to file Reply in Support of Motion for Grand Jury testimony; Meet with SML, RJF, LWZ to prepare for pretrial hearing and discuss strategy; Conference call with Joe B.	7.40	300.00	2,220.00
05/09/2018	SML - Prep for FPT and trial prep; Discovery review and timeline; Meet with Bob Fedor to discuss and prep for FPT.	7.50	395.00	2,962,50
05/09/2018	LWZ - Meet with counsel; Review motions; Conference call; Prep for PTC.	7	450.00	3,150.00
05/10/2018	BAM - Prepare for motion hearings; Travel to and from pretrial; Meet with RJF, LWZ, SML and client; Research, draft and file motion to quash subpoenas.	8.30	300.00	2,490.00
05/10/2018	SML - To US District court - Youngstown for FPT.	5	395.00	1,975.00
05/10/2018	SML - Further trial prep - timeline, T/C's with Tom Pavlish and Bob Fedor re: subpoenas and Evelyn Terry contact info.	1.50	395.00	592.50
05/10/2018	LWZ - Final PTC.	5	450.00	2,250.00
05/11/2018	SML - Discuss with LWZ; T/C to Fedor and discuss Touhy letter with BAM; Review/print emails from client; Further document review and timeline for trial prep.	3.50	395.00	1,382.50
05/11/2018	LWZ - Meet with SML; T/C with RJF.	2.75	450.00	1,237.50
05/14/2018	SML - Drafting - Timeline and trial preparation.	2.70	395.00	1,066.50
05/15/2018	SML - R/R of 404(B) notice by government; Begin review re: jury instructions draft;	1.70	395.00	671.50

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DATE	DESCRIPTION	CTY	RATE	AMOUNT
	Research re: other acts, defenses, etc.; Trial prep; Timeline.			
05/15/2018	SML - Office conference with Leslie Page, LWZ, Fedor, BAM - interview witness.	1.70	395.00	671.50
05/15/2018	BAM- Meet with RJF, Meet with Leslie Page, Meet with LWZ and SML, Travel to US Attorney's office to pick up new discovery, review new discovery, draft supplemental brief in support of grand jury testimony and motion to dismiss based on new discovery.	8.70	300.00	2,610.00
05/15/2018	LWZ - Meet with SML and Leslie Page.	1.50	450.00	675.00
05/16/2018	BAM- Meet with RJF, LWZ, SML and Leslie Page, Review Government's proposed joint Voir Dire, draft and file supplemental brief based on new discovery from Government regarding deposit transfers for first and third quarters of 2010.	7.20	300.00	2,160.00
05/16/2018	SML - Review jury instructions from Fedor office and highlight issues; Highlight my proposed instructions from May 6th circuit case re: good faith, etc.; Further exhibit review and timeline.	1.40	395.00	553.00
05/16/2018	SML - Trial prep with Fedor, BAM, LWZ; Timeline and document review.	4.50	395.00	1,777.50
05/16/2018	LWZ - Meet with BAM, Page, Review motions.	6	450.00	2, 7 00.00
05/17/2018	BAM- Draft and edit proposed voir dire, meet with SML to review proposed joint voir dire, email communications with AUSA's and defense counsel regarding	7.10	300.00	2,130.00

DATE	DESCRIPTION	QTY	RATE	TAMOUNT
	proposed joint voir dire, research draft motion in limine regarding 404(b) evidence, file exhibit to supplemental brief under seal, Review Government's brief in opposition to supplemental motion to disclose grand jury transcript and dismiss indictment.			
05/17/2018	SML - Trial prep; Document review, timeline, etc.	4.20	395.00	1,659.00
05/18/2018	SML - Trial prep, pleading/jury instruction review, etc.	2	395.00	790.00
05/18/2018	BAM - Research, draft and file motion in limine to exclude other acts evidence.	6	300.00	1,800.00
05/19/2018	SML - Trial prep; Document review.	2.50	3 95.00	987.50
05/20/2018	BAM - Review Ken Grant docket and inmate locator; Email information on Ken Grant to LWZ, SML and RJF.	0.50	300.00	150.00
05/21/2018	SML - Travel to Raleigh, North Carolina with Fedor for interviews of Joe Burmester; Airport out 8:30 am.; Arrive 12:15	15.70	395.00	6,201.50
05/21/2018	LWZ - T/C with SML and RJF.	0.50	450.00	225.00
05/22/2018	SML - Discuss with LWZ re: Burmester interview and begin typing notes re: interview.	0.30	395.00	118.50
05/22/2018	BAM - Draft Reply in Support of Motion in Limine regarding other acts evidence; Research and begin drafting letter to government regarding objecting to modification of indictment.	6.70	300.00	2,010.00
05/22/2018	LWZ - Meet with SML.	0.25	450,00	112.50

DATE	DESCRIPTION	QTY	RATE	AMOUNT
05/23/2018	SML - Trial prep; Jury instructions due again; Discuss with Fedor by phone, etc.; Discuss other motions with BAM.	2.70	395.00	1,066.50
05/23/2018	BAM - Draft and send letter to government regarding objecting to modification of indictment; Phone calls with RJF; Email correspondence with RJF, SML, LWZ and government attorneys; Telephone conference with government attorneys; Draft and file notice of inability to agree conforming the indictment.	5.30	300.00	1,590.00
05/23/2018	LWZ - Review emails.	0.50	450.00	2 25.00
05/24/2018	SML - Meeting with Gary Gruver with Fedor; Trial prep; Discuss demonstrative exhibits with Adam, Fedor, etc.; Draft demonstrative exhibits re: IRS payments by Attevo for 2010, 2011, 2012; Email to Fedor, BAM, LWZ; R/R of email to Coliyer from Fedor with our demonstratives; R/R of government demonstrative exhibits; Discuss Frazier Motion in Limine with Fedor and BAM.	8.30	395.00	3,278.50
05/24/ 2 018	BAM - Draft and file brief in opposition to quash second round of subpoenas directed to IRS and DOL; Meet with SML, RJF, LWZ and defense expert witness; Draft and file motion to exclude testimony of Charles Frazier; Email correspondence with SML and RJF.	7	300.00	2,100.00
05/24/2018	LWZ - Meet with SML, BAM and RJF.	2.50	450.00	1,125.00
05/24/2018	AMB - Meet with SML, BAM and Fedor; Discuss demonstrative exhibits; Begin prep of tables for	1.60	250.00	400.00

DATE (1977)	DESCRIPTION	QTY	. PATE	AMOUNT
05/25 /2 018	boards. AMB - Continue prep of	1.10	250.00	275,00
	Chart/table; Meet with SML re: government discovery and gov/def exhibits; Copy all onto Mac; Explore options re: Fedex demonstrative exhibits.			
05/25/2018	BAM - Draft and file Reply in Support of Motion to exclude Charles Frazier testimony; Review jury questionnaires with RJF and SML; Meet with Leslie Page, RJF and SML; Review orders issues by Judge.	8.20	300.00	2,460.00
05/25/2018	LWZ - Trial prep; Meet with Paige.	1.50	450.00	675.00
05/26/2018	SML - Trial prep and closing, etc.	5.50	395.00	2,172.50
05/26/2018	AMB - Travel to Fedex on East 9th and Independence; Adjust word docs, printing margins, sizes to fit one tax year per board; Prep of demonstrative exhibits, large printing and mount to boards; Expedite preparation due to holiday weekend.	4.40	250,00	1,100.00
05/26/2018	BAM - Prepare for trial; Review bank records regarding the dates of credit card advances and cash deposits.	5.70	300.00	1,710.00
05/27/2018	SML - Trial prep and finish closing; Begin Burmester Jencks review.	5	395.00	1,975.00
05/27/2018	BAM - Research and draft motion objecting to exhibits that Government intends to introduce without calling custodian of records; Prepare for trial.	4.20	300.00	1,260.00
05/27/2018	LWZ - Trial prep and Jenks review.	2.25	450.00	1,012.50
05/28/2018	SML - Travel to Youngstown for trial and trial prep.	6	395.00	2,370.00

DATE A	DESCRIPTION	QTY	RATE	AMOUNT
05/28/2018	BAM - Prepare for trial; Research, draft, and file motion objecting to exhibits that Government intends to introduce without calling custodian of records.	5.50	300.00	1,650.00
05/28/2018	LWZ - Travel; Prep for voir dire.	4.50	450.00	2,025.00
05/29/2018	SML - 1st day trial; Voir Dire; Prepare for day 2.	14.50	395.00	5,727.50
05/29/2018	BAM - Travel to and from federal courthouse in Youngstown; Appear for trial.	13	300.00	3,900.00
05/29/2018	LWZ - Trial; voir dire prep.	13.50	450.00	6,075.00
05/30/2018	SML - 2nd day of trial; Prepare for day 3.	12.50	395.00	4,937.50
05/30/2018	BAM - Prepare for trial; Travel to and from federal courthouse in Youngstown, appear for trial; Research issues regarding admissibility of repayment 401(k) issue including new case cited by the Government, U.S. v. White.	13	300.00	3,900.00
05/30/2018	LWZ - Trial and prep.	12	450.00	5,400.00
05/31/2018	SML - 3rd day trial and prepare for day 4.	11	395.00	4,345.00
05/31/2018	BAM - Review Jenks material provided by Government; Prepare for trial; Travel to and from Federal courthouse in Youngstown; Appear for trial; Research issues regarding admissibility of repayment of 401(k) issue including new case cited by the Government.	16.30	300.00	4,890.00
05/31/2018	LWZ - Trial and prep.	11.25	450.00	5,062.50
06/01/2018	SML - 4th day of trial.	10	395.00	3,950.00
06/01/2018	BAM - Review Jenks material provided by Government; Prepare for trial; Travel to and from federal courthouse in Youngstown; Appear for trial.	12.50	300.00	3,750,00
06/01/2018	LWZ - Trial and prep.	10.50	450.00	4,725.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
06/03/2018	BAM - Review Jenks material provided by Government; Prepare for trial; Review DOL records regarding proffer of excluded evidence of 401(k).	5.30	300.00	1,590.00
06/03/2018	SML - Prep for day 5 of trial.	2	395.00	790.00
06/03/2018	LWZ - Trial prep; Travel to Youngstown; Meet with SML.	4.50	450.00	2,025.00
06/04/2018	BAM - Review Jenks material provided by government; Prepare for trial; Travel to and from federal courthouse in Youngstown; Appear for trial; Meet with LWZ, RJF, David and SML for dinner to discuss trial strategy.	17	300.00	5,100.00
06/04/2018	SML - 5th day trial and prep for day 6.	12.40	395.00	4,898.00
06/04/2018	LWZ - Trial prep; Trial; Review Jenks; Prep for cross.	12 .7 5	450.00	5,737.50
06/05/2018	BAM - Review Jenks material provided by government; Prepare for trial; Travel to and from federal courthouse in Youngstown; Appear for trial; Meet with LWZ, RJF, David and SML for dinner to discuss trial strategy.	17.50	300.00	5,250.00
06/05/2018	SML - 6th day trial; Prep with Gruver and prep for day 7.	14	395.00	5,530.00
06/05/2018	LWZ - Trial; Review Jenks; Trial prep; Meet with expert witness, RJF, BAM, SML and expert.	1 4. 50	450.00	6,525.00
06/06/2018	BAM - Review Jenks material provided by government; Prepare for trial; Travel to and from federal courthouse in Youngstown; Appear for trial.	14.50	300.00	4,350.00
06/06/2018	SML - 7th day of trial and break until June 11, 2018.	9	395.00	3,555.00
06/06/2018	LWZ - Prepare for trial; Trial.	12.25	450.00	5,512.50

DATE	DESCRIPTION	QTY	RATE	AMOUNT
06/07/2018	LWZ - Meet with BAM and SML re: expert report/testing.	0.25	450.00	112.50
06/08/2018	BAM - Research; Draft and file brief in opposition to motion requesting the admission of cognovits into evidence and to recall government witnesses.	4	300.00	1,200.00
06/08/2018	SML - Review jury instructions; Draft proposed jury interrogatories, research and drafting re: jury instruction and jury instruction opposition; Email to Fedor and T/C's with Fedor re: jury instructions issues; Review motion in limine issue and discuss with BAM; Begin prep closing argument.	6.50	395.00	2,567.50
06/10/2018	BAM - Review exhibits and Jenks materials pertaining to DOL agent; Draft outline for cross examination of DOL agent; Review court order regarding cognovit note; Research case law regarding permitting a witness or prosecutor to inform jury of uncharged conduct due to statute of limitation issues.	5.50	300.00	1,650.00
06/10/2018	SML - Prep (continued) - closing argument.	2.50	395.00	987.50
06/11/2018	BAM - Review notes for cross examination of DOL agent; Travel to and from federal courthouse in Youngstown; Review correspondence regarding proposed jury instructions.	14.30	300.00	4,290.00
06/11/2018	SML - Trial day 8; Presentation of evidence complete; Prep for closing argument.	13	395.00	5,135.00
06/11/2018	LWZ - Trial prep; Trial; Exhibits.	14.50	450.00	6, 525.00
06/12/2018	BAM - Travel to and from federal courthouse in	11.50	300.00	3,450.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	Youngstown; Review final proposed drafts of jury instructions; Appear for trial.			
06/12/2018	SML - Trial day 9 - jury instructions and closing arguments; Verdict; Not guilty on counts 1 & 3 - Guilty on counts 2.4.5.6.7 and 8; Sentencing October 9, 2018; Meeting with LWZ, BAM, Fedor, David and Michelle Snyder.	8.50	395.00	3,357.50
06/12/2018	LWZ - Trial prep; Close; Verdict.	8.25	450.00	3,712.50
06/13/2018	SML - Discuss with LWZ re: appellate issue.	0.10	395.00	39.50
06/25/2018	SML- Review Rule 29 Brief from Robort Fedor's Office. T/C with BAM, Robert Fedor and LWZ, Re: Rule 29 Motion. Review Fedor 2nd Draft and E-Mail to Robert Fedor, LWZ and BAM.2ND Revision to Robert Fedor, BAM and LWZ.	1.20	395.00	474.00
06/25/2018	BAM- Telephone Conference with SML, RJF and LWZ, Re: Motion for Judgment of Acquittal and new Trial, file motions, review e-mail correspondence from client.	0.40	300.00	120,00
08/03/2018	SML- Discuss with LWZ. T/C/ to and from Fedor, Re: Status. Fedor intends to file Motion to Continue Sentencing. Has reached out to Collyer. Draft letter to client, Re: Status of questionnaires, etc. to LWZ.	0.70	395.00	276.50
08/06/2018	SML- Letter (Revisions) E-Mailed to client and copy to Fedor. R/R of E- Mail from C. Snyder.	0.30	395.00	118.50
08/07/2018	SML- E-Mails and Discussions with LWZ Re: Scheduling.	0.10	395.00	39.50

DATE	DESCRIPTION	QTY	RATE	AMOUNT
08/10/2018	SML- Office Conference with Client, Michelle Snyder, LWZ, Phil Korey Re: Sentencing.	1	395.00	395.00
08/10/2018	LWZ- Meet with client.	1.50	450.00	675.00
08/13/2018	SML- Review Sentencing Issues, Draft Notes, Prep for Meeting.	1.40	395.00	553.00
08/13/2018	SML- Office Conference with Client, Michelle Snyder, Phil Korey Discussions with Phil Korey	2.80	395.00	1,106.00
08/16/2018	SML- Review Client responses to Sentencing forms. Office Appointment with LWZ, Phil, Fedor, Client and Michelle Snyder, Re: Sentencing Strategies.	1,60	395.00	632.00
08/23/2018	SML- E-Mails Re: Scheduling PSI Interview for tomorrow at 12:00 p.m. Discuss with LWZ.	0.30	395.00	118.50
08/24/2018	SML- Office Conference with Client, Michelle Snyder Phil Korey, LWZ, P/O Kevin, Re: Phone Interview for PSI.	1	395.00	395.00
08/24/2018	LWZ- T/C With P/O/. Meeting with Client.	1	450.00	450.00
09/04/2018	SML- T/C to and from Fedor, Re: PSR Objections. Phil Korey will draft Objections and circulate on Thursday 9/6/18.	0.30	395.00	118.50
09/07/2018	SML- T/C from Phil Korey. Review Korey Objections. Review PSI, Draft my Objections, Notes and E- Mails.	1	395.00	395.00
09/10/2018	SML - T/C from and to Phil Korey re: objections, etc.; Discuss meeting/telephone conference; T/C from Korey re: telephone conference 9/11/18 at 11:00 am.	0.20	395.00	79.00
09/11/2018	SML- T/C from Korey; Review PSI and notes; Research; Telephone	4	395.00	1,580.00

DATE	DESCRIPTION		QTY	RATE	TMUOMA
	conference with Fedor Korey, Snyder and late Michael from Fedor's office; Discuss recommendation that it loss amount is intended amount, then intended loss amount for guidelishould be \$0.00; Discus redlining my revisions, etc.; Redlined revisions Discuss with BAM and LWZ; Email redlined document to Fedor; T/6 with Fedor.	er f d nes iss			
09/11/2018	SML - T/C with Korey; Review objections; T/C Fedor and emails re: finalizing objections; Further revisions included count 8 and analysis are research revisions re: multiple count advisory guideline calculations; Email to Clements, Collyer and all (final PS objections) Emails re: written statement of defendant/acceptance.	to ding nd ,	2.80	395.00	1,106.00
09/11/2018	LWZ - R/R objection; T		2.25	450.00	1,012.50
09/12/2018	SML- Draft Pre- Sentencing Investigation	:	2.50	395.00	987.50
09/12/2018	SML - Review timeline written statement of acceptance.	re:	0.30	395.00	118.50
09/12/2018	SML - Office conference re: written acceptance; Discuss re: long version Client will write and em his draft to me; Discuss that letter could be use against him if there is a appeal and if reversal a retrial.	n; ail s d ın	0.80	395.00	316.00
09/13/2018	SML - R/R of email - statement.	(0.10	395.00	39.50
09/13/2018	SML - Email to Clemen Review, revise, etc. re: written acceptance of responsibility; Drafting revisions, emails re: statement.	ts; 2	2.20	395.00	869.00

DATE	DESCRIPTION	TO OTY	div 	RATE	AMOUNT
09/13/2018	LMH - Meeting with SML; Discuss case and issues for research; Research intended loss in tax loss calculations.	4.80		75.00	360.00
09/14/2018	SML - T/C from Phil Korey re: acceptance letter; He will make further revisions that he believes are important; He is in communication with Snyder - discuss re: I am out of town and cannot make revisions, etc.; That he can make any revisions, cuts, additions, etc. that he believes are warranted.	0.40		395.00	158.00
09/14/2018	LMH - Draft memo; Research tax loss calculation for tax evasion statute.	3.50		75.00	262.50
09/20/2018	LMH - Reading all letters, sorting and organizing TOC; Research tax loss calculations; Draft sentencing memo.	8.50		75.00	637.50
09/21/2018	LMH - Research downward variances; Research 5H1.6 family and financial dependence; Draft sentencing memo.	6.90		75 , 00	517.50
09/27/2018	LMH - Research family financial dependence exceptional cases; Sentencing memo.	2,30		75.00	172.50
09/30/2018	AMB - P/C to Phil Korey (x2), left messages; P/C with Phil re: sentencing memorandum	0.50		250.00	125,00
10/01/2018	SML - Discussions, emails, phone calls, etc. with LWZ, Adam, Brian, Fedor, Korey, client re: sentencing memo.; Drafting sentencing memorandum; Prep and file and online filing with Adam.	12		395.00	4,740.00
10/01/2018	BAM - Review character letters; Draft summary of letters for sentencing memo; Review and edit	5.50		300.00	1,650.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	sentencing memo; Meet with SML and AMB in finalizing sentencing memorandum			
10/01/2018	LWZ - Review with SML and sentencing memorandum; TC with client.	4.50	450.00	2,025.00
10/01/2018	AMB - P/c to Fedor re Final PSI. Prep & file M. for Leave to File Sent. Memo under seal. P/c w/ LWZ. Discuss w/ SML. Assist w/ organization, marking, and citations to Exhibits throughout Sentencing memo. Scan all exhibits individuals and label. Edits to Sentencing Memo. P/c w/ Fedor. P/c w/ Client & SML. File Sentencing Memo.	4.40	250.00	1,100.00
10/02/2018	SML - R/R of emails and email from court re: sentencing on October 9th 2018 as originally scheduled; Email to client and all counsel re: this order and meeting.	0.30	395.00	118.50
10/02/2018	LWZ - T/C with Phil Korey; Meet with SML; R/R.	1.75	450.00	787.50
10/02/2018	LWZ - T/C with client; Meet with SML.	0.25	450.00	112.50
10/03/2018	SML - Review Korey supplemental pleading; T/C to Phil Korey (with LWZ) re: what to cut out and to revise and recirculate.	0.40	395.00	158.00
10/04/2018	SML - Emails, T/C with Korey re: sentencing and conference at 3:0 pm.; T/C conference with client, Korey, Fedor and LWZ.	0.70	395.00	276.50
10/04/2018	LWZ - Conference call .	0.50	450.00	225.00
10/05/2018	SML - Review final PSR; Review government brief; Discuss and emails with Adam re: ordering Hoch transcripts.	2 .2 0	395.00	869.00
10/06/2018	SML - Review sentencing	1	395.00	395.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	materials, create binder.			·
10/08/2018	SML - Office conference with David Snyder, Robert Fedor, Phil Korey re: sentencing prep.	3	395.00	1,185.00
10/08/2018	SML - Prepare for sentencing; Review PSR, government brief, defense memorandum, research, etc.	6.50	3 95 .00	2,567.50
10/08/2018	BAM - Review client's medical records, draft and file supplemental exhibit to sentencing memorandum, meet with SML to discuss medical records, review sentencing memorandum originally filed to cite to portions of memorandum relating to Dr. Costa, review research on self-surrender after sentencing	1.30	300.00	390.00
10/08/2018	AMB - Research & memo on self surrender.	2.40	250.00	600.00
10/08/2018	AMB - Research and memo on self surrender.	2.40	250.00	600.00
10/08/2018	LWZ - Prep.	2.75	450.00	1,237.50
10/09/2018	SML - Prep for sentencing; Travel to Youngstown with LWZ, BAM; In court - sentencing hearing (begin); Discuss objections to advisory guideline calculations in PSR; Continued to November 1, 2018.	8.50	395.00	3,357.50
10/09/2018	BAM - Phone calls with clerk of court's office regarding prior filings under seal, draft and file motion to seal supplement exhibit to sentencing memorandum under seal, meet with SML to discuss sentencing	0.70	300.00	210.00
10/09/2018	BAM - Travel to and from federal court in Youngstown with SML and LWZ, meet with client and co-counsel to prepare for hearing, appear for	6	300,00	1,800.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
10/0 9/ 2018	sentencing hearing LWZ - Travel; Sentencing hearing.	7.50	450.00	3,375.00
10/16/2018	BAM - Meet with SML to discuss additional sentencing issues to be briefed; Review email correspondence between client and defense counsel on sentencing issues.	0.30	300.00	90.00
10/17/2018	SML - T/C to Fedor's office and speak with Michael Arnold re: draft by 1:00 pm. tomorrow on Fedor issues and email to all re: drafts by 1:00 pm.	0.30	395.00	118.50
10/18/2018	SML - Discuss with Luke re: his research memo, begin draft supplemental brief.	2	395.00	790.00
10/18/2018	SML - Continued drafting - supplemental brief; Emails to Snyder, LWZ, P. Korey, Fedor, T/C's with Snyder, Korey, Fedor, Finish draft and email to all.	2.50	395.00	987.50
10/19/2018	SML - Continued drafting - supplemental brief; Revisions, etc.; Finalize for filing.	1.80	395.00	711.00
10/19/2018	BAM - Draft, edit, and file supplemental sentencing memo; Research case law and sentencing guideline application notes re: acceptance of	4.20	300.00	1,260.00
·	responsibility after conviction at trial; Email correspondence with SML, LWZ, and co-counsel; Meet with LWZ; Phone call with co-counsel.			
10/24/2018	SML - Print/review (begin) government supplemental sentencing brief.	0.30	395.00	118.50
10/29/2018	SML - T/C to client re: meeting Wednesday at 1:00 pm.	0.10	395.00	39.50
10/31/2018	SML - Office conference with client, LWZ, Phil Korey, Bob Fedor - prep	1	395.00	395.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	for sentencing.			
10/31/2018	SML - Prep for sentencing.	2	395.00	7 90.00
10/31/2018	LWZ - Prep for sentencing.	2.50	450.00	1,125.00
11/01/2018	SML - Travel to and from and to court re: sentencing hearing.	8.70	395.00	3,436.50
11/01/2018	BAM - Travel to and from federal court in Youngstown; Appear for sentencing hearing.	8. 90	300.00	2,670.00
11/01/2018	LWZ - Travel; Sentencing.	8	450.00	3,600.00
		PAYMENT		265,151.00
		BALANCE D	UE \$7	71,703.50

Zukerman, Lear & Murray Co., L.P.A.

3912 Prospect Avenue, East Cleveland, OH 44115 US (216)696-0900

Invoice

BILL TO

Charles David Snyder

INVOICE # 14153 DATE 05/17/2018

DATE	ACTIVITY	QTY	RATE	AMOUNT
05/02/2018	Expense - Conference Lunch	1	31.62	31.62
05/17/2018	Copy Expense	2,035	0.10	203.50
05/25/2018	Expense - MAC for Trial	1	2,609.28	2,609.28
05/29/2018	Expense- Toll	1	7.75	7.75
05/29/2018	Parking Expense	1	2.00	2.00
05/30/2018	Expense	1	10.50	10.50
05/30/2018	Parking Expense	1	2.00	2.00
06/01/2018	Parking Expense	1	10.00	10.00
06/11/2018	Parking Expense	1	2.00	2.00
06/11/2018	Tolls	1	8.00	8.00
06/12/2018	Parking Expense	1	2.00	2.00
06/12/2018	Tolls	1	10.50	10.50
08/29/2018	Copy Expense	14	0.10	1.40
09/10/2018	Copy Expense	392	0.10	39.20
09/18/2018	Copy Expense	72	0.10	7.20
09/20/2018	Copy Expense	30	0.10	3.00
10/05/2018	Expense- Mary L. Uphold	1	338.80	338.80
10/16/2018	Copy Expense	190	0.10	19.00
11/01/2018	Postage Expense	1	7.56	7.56
11/01/2018	Copy Expense	16	0.10	1.60
11/02/2018	Toll	1	2.50	2,50
11/02/2018	Bistro 1907- November 1, 2018	1	57.50	57.50
11/02/2018	Parking Expense	1	2.00	2.00

Electronically Filed 08/20/2029 15:29 / / CV 29 926426 Confirmation Not 2869 50 / CLDSZ

DATE	ACTIVITY	QTY	RATE	AMOUNT
11/02/2018	Toll	1	2.50	2.50
11/02/2018	BAM Toll	1	8.75	8.75
11/02/2018	BAM Parking Expense	1	2.00	2.00
11/29/2018		1	59.40	59.40
	•••••••••••••••••••••••••••••••••••••••	PAYMENT		2,687.80
				2,001.00
		BALANCE DUE		\$763.76

Print

CASE INFORMATION

CV-19-920725 ZUKERMAN LEAR & MURRAY CO. LPA vs. CHARLES D. SNYDER, ET AL.

Summary

Case Number: CV-19-920725

Case Title: ZUKERMAN LEAR & MURRAY CO. LPA vs. CHARLES D. SNYDER, ET AL.

Case Designation: CONSUMER DEBT

Filing Date: 08/30/2019

Judge: BRIAN J CORRIGAN

Magistrate N/A Mediator: N/A

Room: 22A JUSTICE CENTER

Next Action: PRETRIAL on 10/06/2020 at 09:30 AM

File Location: PEND.FILE
Last Status: ACTIVE
Last Status Date: 08/30/2019
Last Disposition: NEWLY FILED
Last Disposition Date: 08/30/2019
Prayer Amount: \$.00

Court of Appeals Case: N/A
Original Case: N/A
Refiled Case: N/A

Service

Party Role	Name	Service Description	Sent Date Response	Response Date
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA	E-FILING SERVICE EMAIL	09/23/2019	
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA		09/23/2019	
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA		10/04/2019	
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA		10/04/2019	
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA		10/29/2019	
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA	Y E-FILING SERVICE EMAIL	10/29/2019	
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA	Y E-FILING SERVICE EMAIL	10/31/2019	
P(1)	ZUKERMAN, LEAR & MURRA CO., LPA	E-FILING SERVICE EMAIL	10/31/2019	
P(1)	TZÜRERMÄN, ŽEXR & MŪRKA CO., LPA	CV 20 936470 / Confirmation Nbr. 2059 E-FILING SERVICE EMAIL	11/04/2019	

8/26/2020	Case: 1:20-cv-02144-DCN Doc #: 1civili daise all in 100 faite all in 100 f	20e33 of 39. PageID #: 35
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/04/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/05/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/05/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/13/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/13/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/25/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/25/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/25/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/25/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/27/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	11/27/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/05/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/05/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/11/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/11/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/11/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/11/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/17/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/17/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/21/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	12/21/2019
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	01/08/2020
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	01/08/2020
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	01/13/2020
P(1)	CO., LPA	01/13/2020
P(1)	CO., LPA	01/20/2020
P(1)	CO., LPA	01/20/2020
P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL CO., LPA	01/30/2020
P(1)	CO., LPA	01/30/2020
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P(1)	ZUKERMAN, LEAR & MURRAY E-FILING SERVICE EMAIL	02/08/2020
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8/26/2020	Case: 1:20-cv-02144-l	DCN Doc#: 16-ivili (Tasile-Voll:Info@n/a2ia/	2age 35 of 39. Page ID #: 37	
D(1)	CHARLES D. SNYDER	E-FILING SERVICE EMAIL	02/24/2020	
D(1)	CHARLES D. SNYDER	E-FILING SERVICE EMAIL	03/04/2020	
D(1)	CHARLES D. SNYDER	E-FILING SERVICE EMAIL	05/18/2020	
D(1)	CHARLES D. SNYDER	E-FILING SERVICE EMAIL	05/20/2020	
D(2)	MICHELLE SNYDER	SUMS COMPLAINT CERTIFIED MAIL	09/05/2019 MOVED	09/13/2019
D(2)	MICHELLE SNYDER	SUMS COMPLAINT CERTIFIED MAIL	11/06/2019 UNCLAIMED	02/13/2020
D(2)	MICHELLE SNYDER	SUMS COMPLAINT CERTIFIED MAIL	01/09/2020 UNCLAIMED	01/29/2020
D(2)	MICHELLE SNYDER	SUMS COMPLAINT REGULAR MAIL SERVICE	01/31/2020	

Case Parties

PLAINTIFF (1)	ZUKERMAN, LEAR & MURRAY CO., LPA 3912 PROSPECT AVE., EAST CLEVELAND, OH 44115	ATTORNEY	DAVID G FINLEY (0003489) 1701 E. 12TH ST SUITE 108 CLEVELAND, OH 44114-0000 Ph: 216-574-4814 Answer Filed: N/A
DEFENDANT (1)	CHARLES D. SNYDER 446 GREENBAG RD., ROUTE 857 MORGANTOWN, WV 26501	ATTORNEY	EDWARD F. HERMAN (0086598) 30628 DETROIT ROAD, #231 WESTLAKE, OH 44145-0000 Ph: 216-410-6261 Answer Filed: N/A
DEFENDANT (2)	MICHELLE SNYDER 19400 FRAZIER DR. ROCKY RIVER, OH 44116	ATTORNEY	EDWARD F. HERMAN (0086598) 30628 DETROIT ROAD, #231 WESTLAKE, OH 44145-0000 Ph: 216-410-6261 Answer Filed: N/A

Docket Information

Filing Date	Docke Party	t Docke Type	^t Docket Description	View Image
08/04/2020	N/A	JE	CASE CALLED FOR PRE-TRIAL. PARTIES CONTINUE TO WORK TOWARDS RESOLUTION. REQUEST SIXTY (60) DAYS. PRETRIAL SET FOR 10/06/2020 AT 09:30 AM. IN ORDER TO REDUCE THE COMMUNITY SPREAD OF COVID 19, THE PRETRIAL SET IN THIS MATTER MUST BE CONDUCTED VIA TELEPHONE CONFERENCE. PLAINTIFF'S COUNSEL TO INITIATE CALL TO DEFENSE COUNSEL AND THEN CONTACT STAFF ATTORNEY AT 216 443 8577 ONCE ALL PARTIES ARE ON THE LINE. NOTICE ISSUED	
05/20/2020	P1	МО	MOTION FILED FOR P1 ZUKERMAN, LEAR & MURRAY CO., LPA CIVIL RULE 54(B) FINDING	
05/128/2020	ca R⁄I File	d (NBT 26/2	20 NOTE OF INTERPOSATION AND REQUESTS FOR PRODUCTION	

8/26/2020	Case	1:20-	cv-02144-DCN Doc#: 1ാഡ് വേട്ടിക്കുറി:പ ്രിക്കി ഷ്ക് 12എം36 of 39. PageID#: 38	
05/01/2020	N/A	JE	DEFENDANT MICHELLE SYNDER'S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM IS WELL TAKEN. CLAIM DISMISSED. NOTICE ISSUED	
05/01/2020	N/A	JE	PRETRIAL HELD. DEFENSE COUNSEL PARTICIPATED VIA TELEPHONE CONFERENCE. DUE TO CONTINUING UNCERTAINTY REGARDING THE COVID PANDEMIC, THIS MATTER MUST BE CONTINUED NINETY (90) DAYS. PRETRIAL SET FOR 08/04/2020 AT 10:00 AM. PLAINTIFF'S COUNSEL TO INITIATE CALL TO DEFENSE COUNSEL AND THEN CONTACT JUDGE CORRIGAN AT 216 443 8694 ONCE ALL PARTIES ARE ON THE LINE. NOTICE ISSUED	
03/23/2020	N/A	SC	PRETRIAL PREVIOUSLY SCHEDULED FOR 04/08/2020 AT 10:00 AM IS RESCHEDULED FOR 04/29/2020 AT 10:00 AM (Notice Sent).	
03/23/2020	N/A	SC	PRETRIAL SCHEDULED FOR 04/08/2020 AT 10:00 AM IS CANCELLED. JUDGE: BRIAN J CORRIGAN (312) REASON: IN AN EFFORT TO REDUCE COMMUNITY SPREAD OF COVID-19, THE EVENT SCHEDULED IN THIS MATTER HEREBY CONTINUED. (notice sent).	
03/04/2020	P1	BR	BRIEF IN OPPOSITION FILED BY P1 ZUKERMAN, LEAR & MURRAY CO., LPA TO DEFENDANT'S MOTION TO DISMISS	
02/24/2020	D2	BR	BRIEF IN OPPOSITION FILED BY D2 MICHELLE SNYDER DEFENDANT MICHELLE SNYDER'S BRIEF IN OPPOSITION TO MOTION FOR RELIEF FROM STAY - TO DEPOSE DEFENDANT	
02/24/2020	D2	МО	MOTION TO DISMISS FILED DEFENDANT MICHELLE SNYDER'S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM	
02/20/2020	P1	BR	BRIEF IN OPPOSITION FILED BY P1 ZUKERMAN, LEAR & MURRAY CO., LPA TO DEFENDANT'S MOTION TO JOIN, ETC.	
02/14/2020	D2	SR	CERTIFIED MAIL RECEIPT NO. 40238599 RETURNED 02/13/2020 FAILURE OF SERVICE ON DEFENDANT SNYDER/MICHELLE/ - UNCLAIMED NOTICE MAILED TO PLAINTIFF(S) ATTORNEY	
02/13/2020	P1	МО	MOTION FILED FOR P1 ZUKERMAN, LEAR & MURRAY CO., LPA MOTION FOR RELIEF FROM STAY - TO DEPOSE DEFENDANT	
02/08/2020	D1	МО	MOTION FILED FOR D1 CHARLES D. SNYDER DEFENDANT CHARLES D. SNYDER'S MOTION TO JOIN PERSONS NEEDED FOR A JUST ADJUDICATION	
01/31/2020	D2	SR	SUMS COMPLAINT(41005133) SENT BY REGULAR MAIL SERVICE. TO: MICHELLE SNYDER 25 ASTOR PLACE ROCKY RIVER, OH 44116-0000 ANSWER DATE: 02/28/2020	
01/31/2020	D2	CS	WRIT FEE	
01/31/2020	N/A	SR	SUMMONS E-FILE COPY COST	
01/30/2020	P1	SR	REQUEST FOR SERVICE FILED REQUEST FOR SERVICE - DEFENDANT MICHELLE SNYDER	
01/30/2020	N/A	SR	CERTIFIED MAIL RECEIPT NO. 40781719 RETURNED 1/29/2020 FAILURE OF SERVICE ON DEFENDANT SNYDER/MICHELLE/ - UNCLAIMED NOTICE MAILED TO PLAINTIFF(S) ATTORNEY	
01/29/2020	D1	SR	CERTIFIED MAIL NUMBER 40453315 ADDRESSED TO CHARLES D. SNYDER(D1) NOT RETURNED BY THE U.S. POSTAL SERVICE AFTER 60 DAYS. NOTICE MAILED TO PLAINTIFF(S) ATTORNEY.	
01/24/2020	N/A	JE	DEFENDANT MICHELLE SNYDER'S RESTATE MOTION FOR PROTECTIVE ORDER, FILED ON 01/12/2020, IS GRANTED. PLAINTIFF'S MOTION TO COMPEL ATTENDANCE OF A PARTY AT A DEPOSITION, FILED ON 12/11/19, IS DENIED SUBJECT TO RECONSIDERATION. PLAINTIFF HAS NOT YET PERFECTED SERVICE UPON THE DEFENDANTS. THE COURT LACKS PERSONAL JURISDICTION OVER THE DEFENDANTS UNTIL THE PLAINTIFF HAS PERFECTED SERVICE OR THE DEFENDANTS WAIVE SERVICE. FINANCIAL FREEDOM ACQUISITIONS LC V. THOMAS, 2012-OHIO-3845 (2ND DIST.). NOTICE ISSUED	
01/21/2020		JE	DEFENDANT SNYDER'S MOTION FOR PROTECTIVE ORDER, FILED ON 11/25/19, IS MOOT PURSUANT TO DEFENDANT SNYDER'S RESTATE MOTION FOR PROTECTIVE ORDER, FILED ON 01/12/2020. NOTICE ISSUED	
01/21/2020	N/A	SR	USPS RECEIPT NO. 40781720 DELIVERED BY USPS 01/13/2020 SNYDER/CHARLES/D. PROCESSED BY COC 01/21/2020.	
01/20/2020		BR	BRIEF IN OPPOSITION FILED BY P1 ZUKERMAN, LEAR & MURRAY CO., LPA PLAINTIFF'S BRIEF IN OPPOSITION TO RESTATE MOTION FOR PROTECTIVE ORDER AND MOTION TO DISMISS	
	ally Filed	MO 08/26/2	MOTION FILED FOR D2 MICHELLE SNYDER DEFENDANT MICHELLE SNYDER'S ^O RESTATED WGTION 470 R PROTECTIVE OR DER ON 1924/2020 - GRANTED	
01/08/2020	N/A	SR	SUMMONS E-FILE COPY COST	

8/26/2020	Case	: 1:20-	cv-02144-DCN Doc#: 1ടപ്പ് ക്ഷേക്രി:പരിക്ക് ഉപ്പം37 of 39. PageID#: 39	
01/08/2020	N/A	SR	SUMMONS E-FILE COPY COST	
01/08/2020	D1	CS	WRIT FEE	
01/08/2020	D1	SR	SUMS COMPLAINT(40781720) SENT BY CERTIFIED MAIL. TO: CHARLES D. SNYDER FEDERAL CORRECTION INSTITUTION P.O. BOX 1000 MORGANTOWN, WV 26507-0000	
01/08/2020	D2	CS	WRIT FEE	
01/08/2020	D2	SR	SUMS COMPLAINT(40781719) SENT BY CERTIFIED MAIL. TO: MICHELLE SNYDER 25 ASTOR PLACE ROCKY RIVER, OH 44116-0000	
01/07/2020	P1	SR	REQUEST FOR SERVICE FILED INSTRUCTION FOR SERVICE CERTIFIED MAIL	
01/07/2020	N/A	JE	CASE CALLED FOR A CASE MANAGEMENT CONFERENCE ON 01/06/20. COUNSEL FOR PLAINTIFF AND DEFENDANTS WERE PRESENT IN COURT. COUNSEL FOR DEFENDANT NOTIFIED THIS COURT THAT THE MOTION TO STAY PROCEEDINGS, FILED ON 10/29/19, IS MOOT AS THE UNDERLYING CRIMINAL CASE HAS CONCLUDED. PLAINTIFF'S MOTION TO TREAT AS MOOT DEFENDANTS' MOTION TO STAY, FILED ON 12/11/19, IS GRANTED. A REVIEW OF THE DOCKET INDICATES THAT THE PLAINTIFF HAS NOT YET PERFECTED SERVICE UPON THE DEFENDANTS. A PRETRIAL IS SET AS FOLLOWS TO ALLOW THE PLAINTIFF TIME TO PERFECT SERVICE. PRETRIAL SET FOR 04/08/2020 AT 10:00 AM. PRETRIAL TO BE HELD IN COURTROOM 22-A, JUDGE BRIAN J. CORRIGAN. COUNSEL FOR PLAINTIFF TO OBTAIN SERVICE UPON THE DEFENDANTS PRIOR TO 04/08/20 OR THE CASE MAY BE DISMISSED PURSUANT TO CIV. R. 41(B) FOR WANT OF PROSECUTION. NOTICE ISSUED	
01/06/2020	D2	SR	CERTIFIED MAIL NUMBER 40238599 ADDRESSED TO MICHELLE SNYDER(D2) NOT RETURNED BY THE U.S. POSTAL SERVICE AFTER 60 DAYS. NOTICE MAILED TO PLAINTIFF(S) ATTORNEY.	
12/21/2019	P1	BR	REPLY BRIEF FILED BY P1 ZUKERMAN, LEAR & MURRAY CO., LPA REPLY TO COMBINED BRIEF IN OPPOSITION TO MOTIONS ETC.	
12/17/2019	D	BR	BRIEF IN OPPOSITION FILED BY DEFENDANT(S) CHARLES D. SNYDER(D1) and MICHELLE SNYDER(D2) COMBINED BRIEF IN OPPOSITION TO MOTIONS TO TREAT AS MOOT AND TO COMPEL	
12/11/2019	P1	МО	MOTION FILED FOR P1 ZUKERMAN, LEAR & MURRAY CO., LPA MOTION TO COMPEL 01/24/2020 - DENIED SUBJECT TO RECONSIDERATION	
12/11/2019	P1	МО	MOTION FILED FOR P1 ZUKERMAN, LEAR & MURRAY CO., LPA MOTION TO TREAT AS MOOT ETC. 01/06/2020 - GRANTED	
12/11/2019	N/A	JE	CASE MGMNT CONFERENCE SET FOR 01/06/2020 AT 10:00 AM. CMC TO BE HELD IN COURTROOM 22-A, JUDGE BRIAN J. CORRIGAN. NOTICE ISSUED	
12/05/2019	N/A	JE	PLAINTIFF'S STIPULATED MOTION FOR CONTINUANCE, FILED ON 12/04/19, IS WELL TAKEN AND IS GRANTED. PARTIES TO CONFER AND THEN NOTIFY THE COURT'S STAFF ATTORNEY WITHIN ONE OF THIS ENTRY OF TWO MUTUALLY AGREEABLE DATES MONDAY TO THURSDAY IN THE MORNING TO RESET THE CASE MANAGEMENT CONFERENCE. NOTICE ISSUED	
12/05/2019	N/A	SC	CASE MGMNT CONFERENCE SCHEDULED FOR 12/23/2019 AT 09:15 AM IS CANCELLED.	
12/04/2019	P1	МО	P1 ZUKERMAN, LEAR & MURRAY CO., LPA'S MOTION FOR CONTINUANCE DAVID G FINLEY 0003489. ^F^ MOTION FOR CONTINUANCE 12/05/2019 - GRANTED	
11/28/2019	N/A	SR	SCHEDULE ATTORNEY NOTICE. NOTICE GENERATED FOR HERMAN/EDWARD/F. 11/28/2019 17:03:24	
11/28/2019	N/A	SR	SCHEDULE ATTORNEY NOTICE. NOTICE GENERATED FOR FINLEY/DAVID/G 11/28/2019 17:03:24	
11/28/2019	N/A	SC	CASE MGMNT CONFERENCE SET FOR 12/23/2019 AT 09:15 AM.	
11/27/2019		BR	BRIEF IN OPPOSITION FILED BY P1 ZUKERMAN, LEAR & MURRAY CO., LPA BRIEF IN OPPOSITION TO MOTION FOR PROTECTIVE ORDER	
11/26/2019	N/A	SR	SUMMONS E-FILE COPY COST	
11/26/2019	D1	CS	WRIT FEE	
11/26/2019	D1	SR	SUMS COMPLAINT(40453315) SENT BY CERTIFIED MAIL. TO: CHARLES D. SNYDER NE OH CORREC CTR, REG NO. 65286-060 2240 HUBBARD ROAD YOUNGSTOWN, OH 44505-0000	
11/25/2019	P1	SR	REQUEST FOR SERVICE FILED REQUEST FOR SERVICE ON CHARLES D. SNYDER	
11/25/2019 ic	a D)2Filed	l M3/2 16/2	0MOTION FILED Fの飛4つ2 MIGHELLIE SNYDER のであるである。 MOTION FOR PROTECTIVE ORDER 01/21/2020 - MOOT	

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11/18/2019	N/A	JE	PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO THE MOTION TO STAY, FILED ON 10/31/19, IS WELL TAKEN AND IS GRANTED. PLAINTIFF HAS THROUGH 11/21/19 TO BEEN A BRIEF IN OPPOSITION TO DEFENDANT'S MOTION TO STAY NOTICE 1991 FR.	
11/15/2019	N/A	SR	TO STAY. NOTICE ISSUED CERTIFIED MAIL RECEIPT NO. 40260515 RETURNED 11/14/2019 FAILURE OF SERVICE ON DEFENDANT SNYDER/CHARLES/D ATTEMPTED NOT KNOWN NOTICE MAILED TO PLAINTIFF(S) ATTORNEY	
11/13/2019	P1	BR	BRIEF IN OPPOSITION FILED BY P1 ZUKERMAN, LEAR & MURRAY CO., LPA ZUKERMAN'S BRIEF IN OPPOSITION TO DEFENDANT'S MOTION TO STAY	
11/06/2019	N/A	SR	SUMMONS E-FILE COPY COST	
11/06/2019	D1	CS	WRIT FEE	
11/06/2019		SR	SUMS COMPLAINT(40260515) SENT BY CERTIFIED MAIL. TO: CHARLES D. SNYDER FEDERAL CORRECTION INSTITUTION P.O. BOX 1000 MORGANTOWN, WV 26507-0000	
11/05/2019	P1	SR	REQUEST FOR SERVICE FILED REQUEST TO REISSUE SERVICE VIA CERTIFIED MAIL	
11/05/2019	D1	SR	CERTIFIED MAIL NUMBER 39658398 ADDRESSED TO CHARLES D. SNYDER(D1) NOT RETURNED BY THE U.S. POSTAL SERVICE AFTER 60 DAYS. NOTICE MAILED TO PLAINTIFF(S) ATTORNEY.	
11/04/2019	N/A	SR	SUMMONS E-FILE COPY COST	
11/04/2019	D2	CS	WRIT FEE	
11/04/2019	D2	SR	SUMS COMPLAINT(40238599) SENT BY CERTIFIED MAIL. TO: MICHELLE SNYDER 25 ASTOR PLACE ROCKY RIVER, OH 44116-0000	
11/04/2019	P1	SR	REQUEST FOR SERVICE FILED REQUEST FOR SERVICE ON MICHELLE SNYDER	
10/31/2019	P1	МО	MOTION FOR EXTENSION OF TIME MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO STAY 11/18/2019 - GRANTED	
10/29/2019	D	МО	MOTION FILED FOR DEFENDANT(S) CHARLES D. SNYDER(D1) and MICHELLE SNYDER(D2) MOTION TO STAY PROCEEDINGS 01/06/2020 - MOOT	
10/04/2019	N/A	JE	DEFENDANTS, DAVID CHARLES SNYDER AND MICHELLE SNYDER, HAVE LEAVE TO RESPOND TO PLAINTIFF'S COMPLAINT THROUGH 11/03/19 PURSUANT TO THE PARTIES' STIPULATION, FILED ON 10/03/19. NOTICE ISSUED	
10/03/2019	D	ОТ	STIPULATION FOR LEAVE TO PLEAD FILED STIPULATED EXTENSION OF TIME TO PLEAD	
09/23/2019	D	NT	NOTICE FILED BY DEFENDANT(S) CHARLES D. SNYDER(D1) and MICHELLE SNYDER(D2) NOTICE OF APPEARANCE OF COUNSEL	
09/13/2019	D2	SR	CERTIFIED MAIL RECEIPT NO. 39658399 RETURNED 09/13/2019 FAILURE OF SERVICE ON DEFENDANT SNYDER/MICHELLE/ - MOVED NOTICE MAILED TO PLAINTIFF(S) ATTORNEY	
09/03/2019	N/A	SR	SUMMONS E-FILE COPY COST	
09/03/2019	N/A	SR	SUMMONS E-FILE COPY COST	
09/03/2019	D2	CS	WRIT FEE	
09/03/2019	D2	SR	SUMS COMPLAINT(39658399) SENT BY CERTIFIED MAIL. TO: MICHELLE SNYDER 19400 FRAZIER DR. ROCKY RIVER, OH 44116	
09/03/2019	D1	CS	WRIT FEE	
09/03/2019	D1	SR	SUMS COMPLAINT(39658398) SENT BY CERTIFIED MAIL. TO: CHARLES D. SNYDER 446 GREENBAG RD., ROUTE 857 MORGANTOWN, WV 26501	
08/30/2019	N/A	SF	JUDGE BRIAN J CORRIGAN ASSIGNED (RANDOM)	
08/30/2019	P1	SF	LEGAL RESEARCH	
08/30/2019	P1	SF	LEGAL NEWS	
08/30/2019	P1	SF	LEGAL AID	
08/30/2019	P1	SF	COURT SPECIAL PROJECTS FUND	
08/30/2019		SF	COMPUTER FEE	
08/30/2019		SF	CLERK'S FEE	
08/30/2019		SF	DEPOSIT AMOUNT PAID DAVID G FINLEY	
08/30/2019		SF	CASE FILED: COMPLAINT, SERVICE REQUEST	

Account	Amount
CLERK'S FEES	\$182.61
COMPUTER FEES	\$20.00
COURT SPECIAL PROJECTS FUND	\$50.00
LEGAL AID	\$25.74
LEGAL NEWS	\$10.00
LEGAL RESEARCH - CIVIL	\$3.00
TOTAL COST	\$291.35

Only the official court records available from the Cuyahoga County Clerk of Courts, available in person, should be relied upon as accurate and current.

Website Questions or Comments.

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